Section 1. Registration Information

Source Identification

Facility Name:	DuPont - Parlin
Parent Company #1 Name:	DuPont Specialty Products USA, LLC
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	16-Nov-2020
Postmark Date:	16-Nov-2020
Next Due Date:	16-Nov-2025
Completeness Check Date:	16-Nov-2020
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0013 1163
Other EPA Systems Facility ID:	
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	869330050
Parent Company #1 DUNS:	869330050
Parent Company #2 DUNS:	869330050

Facility Location Address

Street 1:	250 Cheesequake Rd
Street 2:	
City:	Parlin
State:	NEW JERSEY
ZIP:	08859
ZIP4:	
County:	MIDDLESEX

Facility Latitude and Longitude

Latitude (decimal):	40.458139
Longitude (decimal):	-074.328806
Lat/Long Method:	Unknown
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	2
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

Owner or Operator

Operator Name:	DuPont Specialty Products USA, LLC
Operator Phone:	(732) 613-2100

Mailing Address

Operator Street 1:	250 Cheesequake Rd
Operator Street 2:	
Operator City:	Parlin
Operator State:	NEW JERSEY
Operator ZIP:	08859
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Jason Galinski
RMP Title of Person or Position:	Plant Manager
RMP E-mail Address:	Jason.galinski@dupont.com

Emergency Contact

Emergency Contact Name:	Brad T. Prugh
Emergency Contact Title:	EH&S Manager
Emergency Contact Phone:	(732) 613-2461
Emergency Contact 24-Hour Phone:	(732) 570-1702
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	brad.t.prugh@dupont.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Sayreville LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	251
FTE Claimed as CBI:	

Covered By

OSHA PSM :	
EPCRA 302 :	Yes
CAA Title V:	

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	22-Jul-2019
Last Safety Inspection Performed By an External Agency:	EPA

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	Brad T. Prugh
Preparer Phone:	(732) 613-2461
Preparer Street 1:	250 Cheesequake Rd
Preparer Street 2:	
Preparer City:	Parlin
Preparer State:	NEW JERSEY
Preparer ZIP:	08859
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000113035
Description:	3
Process Chemical ID:	1000141238
Program Level:	Program Level 2 process
Chemical Name:	Acrylonitrile [2-Propenenitrile]
CAS Number:	107-13-1
Quantity (lbs):	50400
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000113035
Process NAICS ID:	1000114388
Program Level:	Program Level 2 process
NAICS Code:	32552
NAICS Description:	Adhesive Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000091209

Percent Weight:	
Physical State:	Liquid
Model Used:	SAFERÂ® Systems TRACE 8.2b
Release Duration (mins):	30
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	Yes
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000097021

Percent Weight:	
Physical State:	Liquid
Model Used:	SAFERÂ® Systems TRACE 8.2b
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	Yes
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	Yes
Other Type:	

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

No records found.

Section 8. Program Level 2

Description:

The Acrylonitrile Preventive Maintenance Program resides in a computer system which, through monthly selection, annually completes inspections, test, calibrations and checks of various components of the Acrylonitrile system. These components include process vessels, piping, valves and pumps, instrumentation, and safety devices.

Program Level 2 Prevention Program Chemicals

Prevention Program Chemical ID:	1000071863
Chemical Name:	Acrylonitrile [2-Propenenitrile]
Flammable/Toxic:	Toxic
CAS Number:	107-13-1
Process ID:	1000113035
Description:	3
Prevention Program Level 2 ID:	1000071094
NAICS Code:	32552

Safety Information

Safety Review Date (The date of the most recent review or revision of the safety infomation):	31-Oct-2017

Safety Compliance Regulations or Design Codes/Standards

NFPA 58 (or state law based on NFPA 58):	
OSHA (29 CFR 1910.111):	
ASTM Standards:	Yes
ANSI Standards:	
ASME Standards:	Yes
None:	
Other Regulation, Design Code, or Standard:	
Comments:	

Hazard Review

Hazard Review Date (The date of completion of most recent review or update):	31-Oct-2017
Change Completion Date (The expected or actual date of completion of all changes resulting from the hazard review):	14-Jan-2019

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes

Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	Lightning

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	Yes
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	
Quench System:	
Purge System:	Yes
None:	
Other Process Control in Use:	Flame arrestors, Activated Carbon

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Pits, Catch Tank

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA or PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	Yes
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	27-Oct-2020

Training

Training Review Date (The date of the most recent review or revision of training programs):	18-Jan-2020

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Review Date (The date of the most recent review or revision of maintenance procedures):	07-Jul-2020
Equipment Inspection Date (The date of the most recent equipment inspection or test):	09-Nov-2020
Equipment Most Recently Inspected or Tested:	UPS Battery Test

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	17-Jan-2020
Audit Completion Date (The expected or actual date of completion of all changes resulting from the compliance audit):	31-Dec-2020

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	02-Oct-2020
Incident Investigation Changes Date (Expected or actual date of completion of all changes resulting from the investigation):	18-Dec-2020
Most Recent Change Date: (The date of the most recent change that triggered a review or revision of safety information):	07-Jan-2020

Confidential Business Information

CBI Claimed:

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	08-Oct-2020

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	01-Apr-2020

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Sayerville, LEPC
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(732) 727-4444

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	

Executive Summary

ACCIDENTAL RELEASE PREVENTION AND EMERGENCY RESPONSE POLICIES

The DuPont Parlin Plant is committed to operating and maintaining all its processes in a safe and responsible manner. We adhere to the DuPont Corporate philosophy that:

o All Safety incidents, Environmental incidents, and Occupational injuries and illnesses are preventable;
o All employees and contractors are responsible for their safety; and
o The "Goal is Zero" - Zero Incidents Period, "ZIP".

This means that we continuously strive for zero process safety incidents, zero environmental incidents, and zero injuries. We have programs, procedures, and management practices in place to support this goal of zero. We constantly measure our progress towards this goal of zero and take corrective actions when deemed necessary.

The Corporate policies are embodied in the numerous Safety, Health, and Environmental (SHE) and Engineering Standards, which apply globally. At the Parlin plant, the policies are implemented through the "Safety How" and site Process Safety Management Manual which is available and reviewed by all our employees. In addition, the Parlin Plant's Emergency Manual details the complete emergency program for the site.

Our primary focus is on prevention of any accidental release. However, we have strong emergency response capabilities to back up our prevention activities. We use this combination of prevention programs and emergency response capability to help ensure the safety of our employees and the public as well as the protection of the environment.

FACILITY DESCRIPTION

The DuPont Parlin plant, located in Sayreville, has been in operation since the early 1900's. During this period, the plant has manufactured a variety of products including: paints, thinners, pigments, adhesives, x-ray films, and graphic arts films. We currently manufacture flexographic printing plates used in the printing industry, Teflon® non-stick coatings for cookware, and electronic resins for the computer industry. Acrylonitrile, a TCPA/EPA-regulated substance, is used as a raw material to manufacture one of the products described above.

The plant occupies approximately 350 acres of land of which 140 acres is set aside as a wildlife habitat area. The plant is surrounded by a seven-foot high chain link fence including three angled strands of barbed wire on top. All gates are kept locked except when under direct surveillance by plant guards or other plant personnel. Ingress and egress for plant employees are via a card access system. Visitors, contractors, and vehicular traffic follow an established procedure to enter and exit the plant.

The Facility is located within sight of suburban neighborhoods. The storage of hazardous material and the placement of reactive processes are located in the inner portions of the plant site, each having at least 600 feet to the fence line and approximately 1,000 feet to the nearest homes. The Sayreville Bordentown production well system is about two (2) miles south of the DuPont facility.

ACCIDENTAL RELEASE PREVENTION PROGRAM

The DuPont Parlin plant applies rigorous process safety management practices to all our processes and not just to those covered by laws and regulations. These practices which are designed to prevent accidental releases include:

o A thorough understanding of our process technology; including the safe limits of our processes and the proper design, construction, and installation of our equipment;
o Systematic process hazard review studies to identify and manage process hazards;
o Meeting or exceeding applicable codes and standards;
o Written operating and maintenance procedures;
o Extensive training for all our operators and maintenance personnel;

- o A contractor management system to ensure that work performed by contractors is done safely and meets DuPont's quality standards;
- o Mechanical integrity testing and preventive maintenance to detect and avoid potential equipment problems;
- o Conducting pre-startup safety reviews prior to starting up any new or modified equipment;
- o A work permit system to control hazards;
- o Routine safety audits;
- o Corporate and governmental audits and reviews;
- o Extensive accident prevention and mitigation systems are strategically located throughout the site;
- o Investigations of all incidents with corrective actions taken to prevent recurrence;

In addition to the above-mentioned practices, we have designed our processes to include multiple layers of safeguards such as: low/high concentration chemical detectors that signal alarms to operators and our emergency control center; interlocks to automatically shut down processes when certain deviation are detected and process alarms to warn operators of process deviations; high level alarm on the storage tank; and a concrete dike around the storage tank to contain spills and releases.

EMERGENCY RESPONSE PROGRAM

DuPont Parlin is committed to maintaining strong emergency response capabilities to back up our release prevention activities. The plant has an up-to-date written Emergency Response Plan and we routinely conduct drills to test the plan. Critiques are held on drills and actual events and the Emergency Plan is updated to incorporate key learnings from the critique.

The plant has an emergency response team available 24 hours a day. The team is thoroughly trained and properly equipped to respond to releases of any chemical stored or used on our plant. The plant is a member of the Sayreville Local Emergency Planning Committee and we coordinate our drills with the Sayreville Office of Emergency Management.

If a release occurs:

- o The emergency alarm is sounded;
- o The plant emergency control center is activated;
- o Governmental agencies (federal, state, and local) are notified as appropriate;
- o The emergency response team responds:
- o On-site and fence line monitoring are conducted;
- o After mitigation, the "All Clear" alarm is sounded; and
- o Critique of the incident is conducted.

FIVE-YEAR ACCIDENT HISTORY

There has been no death, injury, property damage, environmental damage, or evacuation due to the accidental release of the regulated substance, Acrylonitrile, from the DuPont Parlin plant in the past five years.

PLANNED CHANGES TO IMPROVE SAFETY

As part of our process hazards review procedures, all of our processes are thoroughly studied on a periodic basis to identify risk reduction opportunities.